Comments Regarding the Remedial Action Work Plan Addendum 4 for
AOC 24: Woodbridge Pond
Hatco Site

Section 4.0 (Extent of the Remediation Area): Please confirm that PCBs < 50 ppm will be disposed in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(**ii**), while PCBs ≥ 50 ppm will be disposed in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(**iii**) (please note the differences).

Response: Confirmed.

Section 5.4.2 (Woodbridge Pond Property Site Preparations): Please confirm that the fill material for staging and access (sand) will not contain PCBs in excess of 1 ppm. While we recognize that the intent is not to have contaminated material/equipment come into direct contact with the fill, we nevertheless recommend that a plan be developed for its sampling prior to use as backfill in other locations.

Response: Weston and our construction contractors will take appropriate precautions to prevent contamination of the clean fill material used to construct the staging and access area. The planned staging and access area is expected to cover 7,000 to 10,000 square feet and will require an estimated 800 to 1,500 cubic yards of clean fill to create a 3- to 4-foot high working platform. These dimensions will be finalized as part of the final permit application. As specified in Section 10.0, the clean fill material will meet the definition under N.J.A.C. 7:26E-1.8.

Prior to reuse of this material as backfill within the pond, Weston will resample the surface to ensure that the clean fill was not contaminated during the remediation activities. Weston will collect one sample per 1,000 square feet of surface area for analysis of PCBs and BEHP. Should the clean fill material exhibit evidence of contamination the affected material will not be reused in the pond and will be disposed offsite if not suitable for reuse elsewhere onsite.

Section 5.7 (Surface Water Treatment and Discharge): Please confirm that the temporary water treatment system will be designed and monitored to ensure removal of PCBs to at least 0.5 parts per billion (i.e., the unrestricted use level of 40 CFR 761.79).

Response: Based on discussions with NJDEP, the dewatering system will not require a discharge permit. Weston proposes to collect samples of the water drained from the sediments after solids removal. During the first month of dewatering, one sample will be collected each week for the first four weeks. After that, samples will be collected on a monthly basis. The samples will be analyzed for total suspended solids and for PCBs for verification purposes.

Section 5.8 (Waste Classification and Handling):

- Please confirm that waste will be stored for disposal in accordance with 40 CFR 761.65.

- The text on Page 5-5 states that dewatered sediments will be characterized for disposal. However, please be aware that the type of disposal facility selected (i.e., TSCA-permitted or RCRA Subtitle D) must be made based on the in situ (pre-excavation) concentrations.

Response: Confirmed. Excavated material will be segregated based on PCB concentrations determined in-situ.

Section 6.0 (Remediation Standards): The Alternate Remediation Standards (ARSs) for Woodbridge Pond sediment are stated as 1 mg/kg (dry weight) PCBs and 22 mg/kg (dry weight). Please confirm that the PCB ARS is based on total Aroclor PCBs and that the method of compliance will be point-by-point. Furthermore, since Section 1.1 states that the future use of this Woodbridge Township-owned property is "unrestricted access and public recreational use for boating and fishing," please explain how these ARSs are protective for recreational exposure scenarios.

Response: The PCB ARS is based on total Aroclor PCBs and that the method of compliance will be point-by-point. The planned use of the pond has not changed since the inception of the project. The ARS of 1 mg/kg PCBs is based on the criterion previously established for the offsite sediments and described in the risk-based PCB disposal approval letter from USEPA dated March 30, 2005. The ARS of 22 mg/kg BEHP was suggested by NJDEP and accepted by Weston during the Technical Consultation meeting on May 7, 2015.

Section 7.1.2 (Pre-Excavation Verification Samples): This section explains that certain samples that were previously collected and analyzed during the remedial investigation (RI) will serve as pre-excavation verification samples, and that this was previously agreed upon in discussions with the EPA. While it is recognized that turbidity curtains will be used to minimize contamination transport within the pond, the possibility still exists that contamination could be transported, by the act of dredging, to places where post-excavation sampling will not be collected. With the exception of the two sample locations identified below, the use of certain delineation samples in lieu of post-dredging samples will be acceptable, provided that sediment suspended through dredging is effectively contained through the use of turbidity curtains.

Based on a review of Figure 7-1, there are two RI samples that appear to be relatively distant from their respective grid nodes; these are CP-45 and CP-54. We therefore recommend that post-excavation samples be collected at the nodes.

Response: The proposed remediation approach assumes that the technologies employed will function as intended. If there is a failure that results in cross-contamination of a portion of the pond, then appropriate measures will be taken to correct the problem including removal of affected sediments and collection of additional post-dredging samples as appropriate. The extent of any such corrective measure would be discussed with the regulators when and if such and occurrence were to take place. Weston agrees to collect post-excavation samples at the two grid nodes indicated above.

Section 7.1.5 (Sediment Sample Processing): In the first bullet on Page 7-4, if small holes are to be drilled through the liner to allow excess water to drain, please verify that the drill bit will be decontaminated between liners.

Response: Drill bits will be decontaminated prior to each use consistent with any other reusable sampling equipment as described in Section 7.3.

Section 7.3 (Equipment Decontamination): Wipe samples should be collected of the heavy equipment even if the equipment contacted sediments with < 50 mg/kg PCBs.

Response: Equipment that comes into contact with PCB-contaminated waste (i.e., PCB-concentration greater than 1 mg/kg) will be decontaminated. Wipe samples will be collected to verify adequate decontamination before the associated equipment will be removed from the site.

Section 11.5 (Wetland Monitoring Activities): This section states "wetland plantings will be monitored," yet the two prior sections specifically state that that plantings will not be used for the pond or wetland restorations (i.e., natural revegetation/seed bank will be relied upon). Please note that wetland restoration, mitigation, and monitoring plans must be in accordance with NJDEP Land Use Regulation Program permit requirements.

Response: Wetland restoration and monitoring will be performed in accordance with the permit requirements.

Appendix F, Table 3-1: Method SW-846 3510C is a liquid/liquid extraction method and should only be used where there is little to no sediment.

Response: The incorrect extraction method was cited in the table. Weston will use either Method 3500B/3540C or Method 3500B/3550B for extraction and analysis.

Figure 2-3: In this figure, a number of highly contaminated samples are located outside of the dark blue line which indicates the "Current Woodbridge Pond Extent (2015)." Examples of the locations are CP-12, CP-16, CP- 25, CP- 26. Please verify that these locations are included for excavation and post-excavation sampling.

Response: The samples indicated above fall within the limits of the proposed excavation and post-excavation sampling.